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I. INTRODUCTION

As the sponsoring agency responsible to operate a new countywide 800 MHz trunked interoperable radio system serving county and local public safety agencies, the Jefferson County 911 Dispatch Board of Jefferson County, Missouri, (“The BoardBoard”) appointed to represent all public safety agencies within Jefferson County (that includes 7 municipalities, 11 law enforcement agencies, 22 fire departments and districts with 1,428 radios operating within the geographic borders of Jefferson County) which will migrate to the new county-wide emergency communication system (listed in Appendix A) hereby respectfully requests that the Federal Communications Commission (“Commission” or “FCC”) grant a waiver of 47 C.F.R. § 90.209(b), specifically the requirement to convert 49 FCC radio authorizations (listed in Appendix B) operating within the Board of Jefferson, MO to a bandwidth of 11.25 kHz or less by the date of January 1, 2013.¹ The new county-wide radio system will be operated and managed by the Board. The Board appointed the Board’s policy group that includes representation from County and Municipal Police Departments, Municipal Fire Departments and Fire Districts, and county and municipal leadership. We believe that the current narrowbanding deadline of December 31, 2012 poses a significant threat to the St. Louis Urban Area² (“Urban Area”) and the Board plan to complete implementation of an essential interoperable communication county-wide system for all first responders in the St. Louis Urban Area. The Urban Area encompasses over 250 public safety agencies with over 23,000 public

¹ See *Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, Third Memorandum Opinion and Order, Third Further Notice of Proposed Rule Making and Order, WT Docket No. 99-87, 19 FCC Rcd 25045, 25051-52 ¶¶ 12-13 (2004) (requiring most PLMR licensees in the 150-174 MHz and 421-512 MHz bands to migrate to 12.5 kHz technology by January 1, 2013) (Narrowbanding Memorandum Opinion and Order); see also 47 C.F.R. § 90.209(b)(5).*

² The Urban Area is defined as the Missouri counties of Franklin, Jefferson, St. Charles, St. Louis, the independent City of St. Louis, and the Illinois counties of Madison, Monroe and St. Clair.

safety radio users.

II. BACKGROUND

In 2003 the federal government began the Urban Areas Security Initiative (UASI) program to help urban areas deemed at risk to enhance their security in the face of terrorism and natural disasters. With funding from the UASI program, the St. Louis Area Regional Response System (STARRS) developed a Regional Emergency Communications Plan for improving interoperability in the St. Louis Urban Area. With the exception of the City of St. Louis, each of the counties in the UA has within its borders different forms of local government - which range from local municipalities with their own services (police, fire, public works, etc.) to single purpose political subdivisions that include fire protection, ambulance, school and sewer districts.

The Board is a sponsoring agency in cooperation with the East-West Gateway Council of Governments to implement an eight county (and the independent City of St. Louis, MO) interoperable St. Louis Regional Land Mobile Emergency Communications Plan that was funded by Homeland Security Grants and was unanimously adopted by the region in June, 2008. The adopted plan was based on Homeland Security guidelines, that each of the eight counties in the Urban Area would fund, implement and operate independent county-wide systems networked together to create a system of systems.

This is part of the Urban Area Security Initiative to combat the threats to the safety of the public that may be caused by natural or man-made situations. Currently, the public safety agencies within the Urban Area are in the process of upgrading, procuring and implementing mission-critical communication systems on the current NPSPAC, Mid-Band, and 700 MHz narrowband radio frequency spectrum as allocated in the FCC NPSPAC & NCC Regions 13

and 24 Planning Committees' 700 and 800MHz frequency plans. The Region 24 NPSPAC plan³ includes significant channel-frequency allocations to the County for the future expansion of its portion of the Emergency Communications Plan. The County has developed an extended implementation plan (see Appendix C) for the current 800 MHz licenses applications that are before the Region 24 Regional Planning Committee. This schedule for licensing of NPSPAC channels is generally similar to those Extended Implementation Schedules that were previously approved by the Federal Communications Commission for other participating counties in the St. Louis Urban Area⁴. Beginning November 2007, the St. Louis Urban Area started the development of the plan for this new system of systems implementation. The independent City of St. Louis is in the final stages of upgrading and expanding its 800 MHz trunked system and expects to complete the migration-to the system in early 2011. During 2009 and 2010, St. Clair County, Illinois expanded the use of its 800MHz trunked radio system to add fire departments that serve St. Clair and its neighboring counties. In addition, the Illinois counties of Madison and Monroe are expanding their use of the state 800MHz system and are transitioning public safety agencies to that state system. In 2009, Jefferson County 911 Dispatch, St. Charles County and St. Louis County in Missouri passed sales tax initiatives to fund the build-out of independent county-wide systems to support all of the public safety agencies that operate within the respective counties. The acquisition process for these systems has started and these three new systems will support over 14,000 of the estimated 23,000 public safety radio users of the Urban Area's combined public safety agencies. This expansion of the Urban Area's Land

³ *Approved by the Federal Communications Commission September 2009*

⁴ *The Commission has approved Extended Implementation Schedules for the participating counties in the St. Louis Urban Area, of which the County of Jefferson will be a participating partner. These included St Louis County WQJY940 et al; St Charles County WQMB525; Franklin County WQJZ339; Monroe County WQJZ340. Jefferson County will be submitting a similar request through the Region 24 NPSPAC Planning Committee for a December 31, 2013 completion date.*

Mobile Emergency Communications Plan represents over \$150 Million in funds that have been committed to provide emergency radio communications to over 50% of the Urban Area's public safety radio users. Franklin County, Missouri is in the final stage of developing its funding plan once implemented; this will complete the regions' transition to 800MHz interoperable radio communications platforms. Jefferson County 911 Dispatch, St. Charles County and St. Louis County are currently scheduled to be evaluating bid proposals during the 3rd and 4th quarter of 2010 and fully expect their new systems to be completed on time and on budget by December 31st 2013.

III. REQUESTS FOR NARROWBANDING WAIVER.

Under Section 1.3 of the Commission's rules,⁵ the Commission may exercise its discretion to waive a rule for "good cause shown."⁶ A waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation will help serve the public interest.⁷

The waiver process allows the Commission to "maintain the fundamentals of principled regulation without sacrifice of administrative flexibility and feasibility."⁸ In deciding whether or not to grant specific waiver requests, the Commission has indicated it must "take into account considerations of hardship, equity, or more effective implementation of overall policy" in its

⁵ 47 C.F.R. § 1.3.

⁶ *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief*, Order, 14 FCC Rcd 6806, ¶ 11 (1999).

⁷ *Id.* (citing *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) and *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969)).

⁸ *WAIT Radio*, 418 F.2d at 1159.

broadest quest for regulation in the “public interest.”⁹ As explained below, granting of the Board’s request on behalf of the public safety licensees would serve policy objectives of the Commission, particularly the deployment of spectrum to meet public safety needs.

Narrowbanding the 274 channel-frequencies authorized by 49 radio authorizations, held by 27 unique FRN number licensees in the County, would divert extensive financial, and human resources to work on radio units and stations that will be dismantled within twelve months of the completion of the new county-wide system. Because of the St. Louis Regional Land Mobile Emergency Communications Plan Regional Plan’s breadth, complexity, and large number of participants, the Board and the Urban Area cannot fully deploy this 800 MHz interoperable system by the January 1, 2013 deadline for narrowbanding. Requiring the Board, the St. Louis Urban Area, and its partner public safety agencies to narrowband, then subsequently have the newly narrow-banded systems decommissioned within a few months appears counter to the public interest. Given the critical need for interoperable communications in the County and the Urban Area, the ability to fully utilize the Urban Area’s Land Mobile Emergency Communications Plan will improve interoperability, promote RF spectrum efficiencies, and reduce threats to the safety and lives of the County and Regions’ first responders and the health and property of the public they serve. Allowing the Board and its member public safety licensees to continue operating on the VHF and UHF frequencies in the wideband mode will further the Commission’s goal of helping public safety provide the most effective and efficient communications for the American public.

⁹ *Id.*

IV. CONCLUSION

The Board of St Louis, the St Louis Urban Area, and its member public safety agencies respectfully request that the Commission grant a waiver of the requirement to attain an efficiency standard of 12.5 kHz through the narrowbanding for the existing 49 VHF and UHF radio authorizations identified in Appendix B. The duration of this waiver is to the end date of the Extended Implementation Schedule, December 31, 2013. That will permit an orderly transfer of the traffic load from those VHF and UHF stations to the new 800 MHz radio facilities. As the traffic is transferred, the radio authorizations for the underlying VHF, UHF channel-frequencies vacated will be cancelled through the appropriate FCC filings.

Implementation project management of the new 800 MHz system will include tracking the prompt cancellation of vacated VHF and UHF channel-frequencies. The new interoperable 800 MHz radio system will have the capability of efficiently accommodating future expansion on the NPSPAC, Mid-Band, and 700 MHz channels.

The Board and St. Louis Urban Area are aware of the high hurdle applied to a waiver of the Commission's rules and the requirement to clearly articulate the detailed considerations in Section 1.925 of the Commission's rules.¹⁰ We believe that this request complies with the submission details of the waiver process in that:

1. The underlying purpose of the narrowband rule would not be frustrated by waiver of this case. The waiver request does not extend the date for reduction of bandwidth to a lengthy or indefinite date, but asks to extend the requirement for a finite period of time to permit the establishment of a new interoperable region wide network. The basis for narrowband is to make additional spectrum available in the VHF and UHF band. This


¹⁰ 47 C.F.R. § 1.925.

goal will be accomplished when the county public safety agencies move to the new system and completely cancel all UHF and VHF licenses that are no longer required.

2. The grant of the waiver will be in the public interest. The cost of narrowbanding is an expense that competes with the need for an improved, interoperable communications network at a time when the economy shortage of tax dollars limits the expansion of funding sources.
3. Unique and unusual factual circumstances indicate the application of the rule would be unduly burdensome to the Board and contrary to the Public Good. The Board and UA had hoped that the new multi-agency interoperable system would be in operation prior to the January 1, 2013 narrowband transition date. As with many large, complex systems involving multi-jurisdictional agencies, the timing was delayed. To this is added the economic downturn, which has constrained state, county, and local governments from committing to large projects. The Board has established the Emergency Communications Policy Group that includes the governance framework for the new county system. Dedicated funding has now been obtained by the Board for the implementation and operation of the new system. A new multi-agency, multi-county, interoperable system is a unique endeavor unto itself and will provide an example of what can be accomplished through cooperative efforts between county and local public safety agencies, and the Commission. We have moved in this direction with the encouragement and at the behest of the Department of Homeland Security who has recognized its value through direct and indirect grants.


Grant of the waiver as described above for each of the 49 VHF and UHF radio authorizations (listed in Appendix B) would therefore be in the public interest.

Respectfully Submitted,

By: 

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V. APPENDIX A – PUBLIC SAFETY AGENCIES IN ST. CHARLES COUNTY

| Public Safety Agencies in Jefferson County, Missouri | |
|---|------------------------------------|
| Law Enforcement | Fire\EMS |
| Antonia Fire Protection District | Saline Valley PD |
| Festus Fire Department | Arnold Police Department |
| Cedar Hill Fire Protection District | Brynes Mill Police Department |
| Crystal City Fire Department | Crystal City Police Department |
| DeSoto Fire Department | DeSoto Police Department |
| DeSoto Rural Fire Protection District | Festus Police Department |
| Dunklin Fire Protection District | Herculaneum Police Department |
| Goldman Fire Protection District | Hillsboro Police Department |
| Hematite Fire Protection District | Jefferson County Sheriff's Office |
| Herculaneum Fire Department | Kimmswick Police Department |
| High Ridge Fire Protection District | Olympian Village Police Department |
| Hillsboro Fire Protection District | Pevely Police Department |
| Jefferson County 911 | |
| Jefferson R-7 Fire | |
| Mapaville Fire | |
| Rock Community Fire Protection District | |
| Saline Valley FD | |
| Big River Ambulance District | |
| Joachim Platin Amb District | |
| North Jefferson County Ambulance District / EMS | |
| Rock Township Ambulance / EMS | |
| Valle Ambulance / EMS | |

VI. APPENDIX B – 49 RADIO AUTHORIZATIONS

| Callsign | License FRN | Licensee Name | Licensee City | Licensee State |
|----------|-------------|---|---------------|----------------|
| KXQ998 | 0008652828 | ANTONIA FIRE PROTECTION DISTRICT | IMPERIAL | MO |
| KUV617 | 0002539518 | ARNOLD, CITY OF | ARNOLD | MO |
| KUV618 | 0002539518 | ARNOLD, CITY OF | ARNOLD | MO |
| WQHD958 | 0002539518 | ARNOLD, CITY OF | ARNOLD | MO |
| WNQE804 | 0009544784 | BYRNES MILL, CITY OF | HOUSE SPRINGS | MO |
| KXB533 | 0003229291 | CEDAR HILL FIRE PROTECTION DIST | CEDAR HILL | MO |
| WPBR238 | 0003229291 | CEDAR HILL FIRE PROTECTION DISTRICT | CEDAR HILL | MO |
| KNAD896 | 0002513943 | CRYSTAL CITY, CITY OF | CRYSTAL CITY | MO |
| KWJ283 | 0002513877 | DE SOTO, CITY OF | DE SOTO | MO |
| KAH451 | 0002513877 | DESOTO, CITY OF | DESOTO | MO |
| KXF531 | 0002513877 | DESOTO, CITY OF | DESOTO | MO |
| KXJ302 | 0002537298 | DUNKLIN FIRE PROTECTION DISTRICT | PEVELY | MO |
| KZI247 | 0002513695 | FESTUS, CITY OF | FESTUS | MO |
| WNKP390 | 0002513695 | FESTUS, CITY OF | FESTUS | MO |
| WXQ985 | 0002513695 | FESTUS, CITY OF | FESTUS | MO |
| KNDS862 | 0008493777 | HERCULANEUM, CITY OF | HERCULANEUM | MO |
| WNMX352 | 0009215831 | HERCULANEUM, CITY OF | HERCULANEUM | MO |
| WPMG977 | 0008808446 | HIGH RIDGE FIRE PROTECTION DISTRICT | HIGH RIDGE | MO |
| KZR659 | 0002537405 | HILLSBORO FIRE PROTECTION DISTRICT | HILLSBORO | MO |
| KZR659 | 0002537405 | HILLSBORO FIRE PROTECTION DISTRICT | HILLSBORO | MO |
| KZR659 | 0002537405 | HILLSBORO FIRE PROTECTION DISTRICT | HILLSBORO | MO |
| WNPG721 | 0002537405 | HILLSBORO FIRE PROTECTION DISTRICT | HILLSBORO | MO |
| WPYY895 | 0002533743 | Jefferson County 911 Dispatch | HOUSE SPRINGS | MO |
| KGK601 | 0002533743 | Jefferson County Dispatch 911 | HOUSE SPRINGS | MO |
| WPBC826 | 0002533743 | Jefferson County Dispatch 911 | HOUSE SPRINGS | MO |
| WPBK501 | 0002533743 | Jefferson County Dispatch 911 | HOUSE SPRINGS | MO |
| WPBP791 | 0002533743 | Jefferson County Dispatch 911 | HOUSE SPRINGS | MO |
| WPNW242 | 0010114924 | JEFFERSON COUNTY PUBLIC WATER SUPPLY DISTRICT #12 | FESTUS | MO |
| KNHH400 | 0002513281 | Jefferson County Public Works | HILLSBORO | MO |
| WSL586 | 0011515483 | JEFFERSON R 7 FIRE PROTECTION DIST | FESTUS | MO |
| KB69102 | 0002533743 | JEFFERSON, COUNTY OF | HILLSBORO | MO |
| KNNJ408 | | JEFFERSON, COUNTY OF | HOUSE SPRINGS | MO |
| WNND757 | 0002513281 | JEFFERSON, COUNTY OF | HILLSBORO | MO |
| WPLY443 | 0002533743 | JEFFERSON, COUNTY OF | HOUSE SPRINGS | MO |

| | | | | |
|---------|------------|---|---------------|----|
| WPQE379 | 0002533743 | JEFFERSON, COUNTY OF | HOUSE SPRINGS | MO |
| WPQI641 | 0002533743 | JEFFERSON, COUNTY OF | HOUSE SPRINGS | MO |
| KYY933 | 0002542777 | JOACHIM PLATTIN TOWNSHIP AMBULANCE DIST | FESTUS | MO |
| WNBS237 | 0004192878 | MAPAVILLE FIRE DEPARTMENT | MAPAVILLE | MO |
| WQKD456 | 0017653684 | NORTH JEFFERSON COUNTY AMBULANCE DISTRICT | HIGH RIDGE | MO |
| KNAH350 | 0002545606 | PEVELY, CITY OF | PEVELY | MO |
| WNKR366 | 0002545606 | PEVELY, CITY OF | PEVELY | MO |
| WNQN828 | 0002545606 | PEVELY, CITY OF | PEVELY | MO |
| WXK645 | 0002545564 | PUBLIC WATER SUPPLY DISTRICT NO 5 OF JEFFERSON COUNTY | DE SOTO | MO |
| KDA374 | 0002541530 | ROCK COMMUNITY FIRE PROTECTION DISTRICT | ARNOLD | MO |
| KRO456 | 0002537751 | Saline Valley Fire Protection District | Fenton | MO |
| KAK618 | 0002530111 | SOUTH COUNTY FIRE ALARM ASSOCIATION INC | ST LOUIS | MO |
| KWE331 | 0002539831 | SPRINGDALE FIRE PROTECTION DISTRICT | FENTON | MO |
| WPGB991 | 0002539831 | SPRINGDALE FIRE PROTECTION DISTRICT | FENTON | MO |

VII. APPENDIX C – EXTENDED IMPLEMENTATION PLAN

Request for Extended Implementation Schedule Expedited Consideration Requested Jefferson County 911 Dispatch, MO

Jefferson County 911 Dispatch, as part of the St. Louis Regional Communications Core Group a consortium of governmental agencies in the Greater St. Louis Region, consisting of the Counties of Franklin MO, St. Charles MO, Madison IL, Monroe IL, Jefferson County, MO, St. Clair IL, St. Louis MO, and the City of St. Louis MO and Jefferson County 911 Dispatch, MO, requests consideration of SLOW GROWTH IMPLEMENTATION as defined in 47CFR 90.629.

In June 2008, the above-referenced governmental agencies elected to move forward with an interoperability strategy with the adoption of the St. Louis Emergency Land Mobile Emergency Communications Plan. The Emergency Communications Plan is based on the following:

1. Networking independent digital county systems (i.e. system of systems) to support interoperable communications for first responders. This consists of interconnecting various county Project 25 trunked digital radio\microwave systems using the new regional microwave system collocated at the county trunked radio sites to improve system reliability and provide regional connectivity.
2. Creating a highly fault tolerant infrastructure thereby supporting all emergency public safety communications within the region.
3. Designing a system with the capacity and functionality to support additional non-emergency municipal users including local, county, regional, state and federal users.
4. Implementing an open standard (Project 25 and IP) based system of systems that is compatible with regional, as well as the State of Illinois and State of Missouri interoperability initiatives, including Region 13 and 24 Regional Planning Committees.
5. Coordinating with critical infrastructure service providers in the region to improve interoperability and share infrastructure where practical.

VIII. OBJECTIVES

The St. Louis Regional Communications Core Group decided to design a seamless regional interoperability emergency communications network that would efficiently utilize existing spectrum and the sharing communications assets. The required policies and procedures for all members of the St. Louis Regional Communications Core Group to support regional communications are currently under development. Three of the five Missouri localities within the St. Louis UASI without P25 systems, including Jefferson County 911 Dispatch, have secured funding for the development of specifications, procurement and implementation for new microwave and P25 radio systems. The remaining county is currently engaged in development of a funding strategy.

IX. GOVERNANCE

The St. Louis Regional Communications Core Group is a sub-committee to the Executive Board of the East West Gateway Council of Governments (EWG), which serves the greater St. Louis area. Members of the Core Group are appointed by members of the EWG Executive Board. Through the auspices of the EWG an Interlocal Agreement setting forth the governance and policies and procedures for regional interoperability is near completion and will serve as the governing document for the region's public safety communications. The Core Group coordinates with the respective county policy groups to improve interoperable communications across the region.

The County Policy Groups consists of representatives from fire, emergency communications, emergency management, emergency medical, police and public works representatives. The Core Group working with the County Policy Groups form working groups to develop communications protocols which once approved the Core Group and County Policy Groups become operating procedures for the region. There is also a technical sub-committee to the Operations Group consisting of technical personnel from the member localities that advise the Core Group on technical matters related to the systems and protocols.

Jefferson County 911 Dispatch has formed a policy group that represents all emergency responders. These groups include county and municipal officials, representatives of municipal fire and police departments and fire and ambulance districts. The county policy groups coordinate county\regional activity with the Core Group. The county policy groups are responsible for coordinating with all emergency response agencies that operate within their respective counties, securing the required funding to implement and operate the county-wide emergency communications systems. County Policy groups have formed county based Operation Groups. The Operations Group is responsible for the development of communications protocols which once approved by the County Policy Group to become operating procedure for the county. There is also a technical sub-committee to the Operations Group consisting of technical personnel from the member localities that advise the Operations and County Policy Group on technical matters related to the systems and protocols.

In summary the Core Group works closely with Jefferson County 911 Dispatch Policy Group to ensure that any opportunity to improve the effectiveness and efficiency of emergency communications is coordinated with local, county, state and federal emergency response agencies.

X. BACKGROUND

Jefferson County 911 Dispatch, and local entities contained, have current radio systems based on vintage conventional communications system architecture. These older systems are also using a significant number of VHF frequency channels that were allocated when the systems were initially installed meanwhile the number of radio users and system requirements have increased expediently throughout the County.

These congested outdated systems frequently experience routine severe radio congestion and that forces agencies to limit access to these capacity stressed systems. This then limits interoperability with public service and public safety organizations in the region due to the limited capacity of the existing channels.

XI. CURRENT STATUS

Jefferson County 911 Dispatch has secured funding for implementing a county-wide system to support all agencies that operate within the County, with capacity to support regional interoperable communications to the systems for all St Louis Regional Communication participants. On April 7, 2009, Jefferson County 911 Dispatch passed a dedicated sales tax to fund the development of this new interoperable communications system. A radio consultant was retained to work with Jefferson County 911 Dispatch to develop system specifications that were included in the request for proposal from radio equipment vendors that was released on February 1, 2010. The specifications are currently in draft review prior to release.

XII. PROPOSED EXTENDED IMPLEMENTATION SCHEDULE

| | |
|-------------------------|--|
| 2010 | |
| 1 st Quarter | Radio Specifications RFP released |
| 3 rd Quarter | Radio System RFP response due |
| 4 th Quarter | Review & Evaluation Initiated |
| 2011 | |
| 1 st Quarter | Bid Evaluation Completed and Contract Awarded |
| 2 nd Quarter | Jefferson County 911 Dispatch Contract Awarded |
| 3 rd Quarter | Site Development Begins |
| 4 th Quarter | System Factory Staging and Acceptance |
| 2012 | |
| 1 nd Quarter | Fixed Base Installation Begins |
| 3 rd Quarter | Installation Completed – Subscriber testing begins |
| 4 th Quarter | Initiate final system acceptance testing |
| 2013 | |
| 1 st Quarter | Install subscriber units into countywide public safety fleet |
| 2 nd Quarter | General Acceptance Testing and system cutover |
| 3 rd Quarter | System burn-in |
| 4 th Quarter | Abandon Legacy frequencies |

Summary

The rules, 47CFR 90.625, provides that specific conditions must be met to attain extended implementation status. The time table schedule details the planned approach to the construction of the system. Specifically, in Paragraph (a)(1), due to the purpose, size, and complex nature of the proposed system, which is comprised of eight major governmental entities and numerous smaller public safety entities, as well as covering two states, a one-year period of time to implement channels isn't feasible. Extremely large systems routinely take the full five-years allowed under Section 90.629

of the Commission's rules and in fact there have been instances that those systems have taken even longer than the Commission's rules permit. Further, in Paragraph (a)(2), the Jefferson County 911 Dispatch system is part of a coordinated and integrated wide area system, which will require more than 12 months to purchase, construct and place into operation. The County has passed the funding hurdle and is moving toward the purchase of the new 800 MHz system.

The St. Louis Regional Communications Core Group has been moving forward on all fronts, from working with Regional Planning Committees for additional spectrum, to passing county tax funding initiatives, to working in the development a state of the art interoperability system to serve all jurisdictions.

Therefore, with good cause shown, it is in the public interest, convenience and necessity to grant the subject request for extended implementation. Such extended implementation authority is in the public interest and will foster the development of total interoperability in the St Louis Urban Area Security Initiative plan.

The county and Public Safety entities with the respective entities will return the VHF frequencies no longer required to support mutual aid and specific operational requirements